



3. Ms. Wade is confident that she can address these authorities (and their progeny) and demonstrate that they do not counsel a different result than the one urged in Ms. Wade's original Memorandum in Support of Motion for Default Judgment.

4. However, Ms. Wade does believe that it would be difficult to give all of the issues implicated by the Second Motion for Default Judgment a complete analysis within the 30 pages permitted by LR 7(F)(3).

5. Accordingly, Ms. Wade respectfully requests leave to exceed the page limit of 30 pages set forth in LR 7(F)(3) by 10 pages in submitting her Memorandum in Support of Second Motion for Default Judgment.

6. In the alternative, Ms. Wade requests leave to incorporate content by reference from her original Memorandum in Support of Motion for Default Judgment (ECF No. 10) into her Memorandum in Support of Second Motion for Default Judgment where appropriate to conserve as much briefing space as possible for addressing the most complex issue presented by Ms. Wade's request for default judgment in this case—i.e., personal jurisdiction.

7. Good cause exists to grant the relief requested herein. Ms. Wade's original filing facially demonstrates that she made every effort to address all of the issues necessary to establish the propriety of default judgment in this case within LR 7(F)(3)'s page limit of 30 pages, but that the analysis was nonetheless unduly cramped.

8. Good cause further exists to grant the relief requested herein in that the personal jurisdiction question raised in this case is a novel one in the Fourth Circuit and, accordingly, merits a greater depth of analysis than more settled issues of law.

## CONCLUSION

Accordingly, Ms. Wade respectfully requests that the Court grant her the relief requested by the Motion and any other relief deemed appropriate.

DATE: August 14, 2019

Respectfully submitted,  
SHERI WADE

By:                     /s/                      
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